



**Kent Downs
National
Landscape**

RENEWABLE ENERGY POSITION STATEMENT



**An Advice Note produced by the
Kent Downs National Landscape Joint Advisory Committee**

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This Statement has been prepared in consultation with and is approved by the Kent Downs National Landscape Joint Advisory Committee (JAC) as forming the official Joint Advisory Committee Position on Renewable Energy in the Kent Downs National Landscape.

Both the nature and extent of the changes in our climate, as well as renewable energy technology itself and the legislative approach to it, are developing rapidly. This Renewable Energy Position Statement will therefore be regularly updated to reflect changes in national policy and renewable energy technology. Minor changes to this Position Statement going forward will be confirmed by the Chair of the Kent Downs JAC, while significant changes will be presented to the JAC for discussion and confirmation.

1. Introduction

On 22 November 2023, all designated Areas of Outstanding Beauty (AONBs) in England and Wales were renamed National Landscapes. Accordingly, the Kent Downs AONB is now the Kent Downs National Landscape. The NPPF has been updated to reflect this new title, however in legislation, the term Area of Outstanding Natural Beauty is still used.

- 1.1 This Position Statement on renewable energy development in or affecting the Kent Downs National Landscape updates the existing Position Statement on this subject, written and adopted by the JAC in 2008 and updated in 2011. It has been prepared in response to the extensive changes in legislation and government policy and guidance since the existing Position Statement was written and in line with the government's current objectives of increasing the supply of energy from renewable sources and of delivering clean power by 2030.
- 1.2 The Position Statement is intended to assist all those who are considering or involved in proposals to generate renewable energy developments within the National Landscape and its setting. This Statement has also been prepared to assist local authorities and other organisations meet their statutory duty as set out in Section 85 of the Countryside and Rights of Way Act 2000 (as amended by the Levelling Up and Regeneration Act 2023) to seek to further the purpose of conserving and enhancing the natural beauty of AONBs in making decisions that affect the Kent Downs National Landscape.
- 1.3 Adjusting to the changing climate is likely to be one of the greatest challenges facing the Kent Downs National Landscape in the 21st century. Warmer wetter winters, drier springs and summers, alongside more extreme weather events, are already affecting landscapes, businesses and communities across the Kent Downs. At the same time nature is itself in decline; as the UK National Biodiversity Strategy and action plan for 2030 acknowledges, 'the UK is currently one of the most nature depleted countries on earth.'
- 1.4 Protected landscapes contain many of the UK's most significant carbon stores which provide important carbon sinks, required to achieve the government's national net zero commitments. As a result, protected landscapes have a crucial role to play in meeting the country's national and international commitments to tackle climate change and restore nature.
- 1.5 As a National Landscape, the Kent Downs partnership is directly charged with driving the delivery of the Government's Protected Landscapes Targets and Outcomes Framework¹, working to mitigate and adapt to climate change by reducing net greenhouse gas emissions and by expanding the stores of carbon within this landscape, including by increasing tree canopy and woodland cover - particularly important here as the Kent Downs is one of England's most wooded National Landscapes. In order for the National Landscape to

¹ Protected Landscapes Targets and Outcomes Framework, DEFRA (2024)

deliver on these responsibilities, it is important therefore that renewable energy developments do not restrict its ability to deliver nature-based solutions to climate change through carbon capture and storage.

- 1.6 This Position Statement promotes a holistic and strategic approach to addressing the climate and nature challenges facing the Kent Downs. Given the established links between these two, it recognises that, alongside working towards a reduction in reliance on fossil fuels as an energy source, there is an equally important role for the National Landscape in providing nature-based solutions, including delivering greater levels of carbon storage in our trees and soils.
- 1.7 Alongside the national policy objective of increasing the supply of energy that is derived from renewable sources, projects that reduce demand for energy itself wherever possible are important, and the Kent Downs National Landscape will therefore continue to play an active role in promoting the use of energy-efficiency measures in both new and existing development, including encouraging developers to aspire to the highest BREEAM standards as part of their developments.
- 1.8 Further advice on design principles can be found in the Kent Downs National Landscape-led Design Handbook. Specific advice on appropriate colour choice to assist in new development integrating into the setting of the Kent Downs landscape can be found in the Kent Downs National Landscape Guidance on the Selection and Use of Colour.

Kent's changing climate

- 1.9 Climate change is already affecting Kent and Medway. As the UK Climate Projections Programme² advises, Kent is now experiencing and at increasing risk of prolonged droughts, water scarcity and flooding incidences, with resultant increased levels of soil erosion, in addition to changes in species distribution and abundance and changes in land management practice. The county's proximity to the continent means an increasing risk of new pests, and diseases as the continent also experiences rising temperatures (Asian Hornets being a recent example), which will have an impact on the landscape and biodiversity of the National Landscape.
- 1.10 Specifically, the Climate Change Risk and Impact Assessment for Kent and Medway³ advises that by 2040 Kent will be experiencing hotter and drier summers with an increase in average summer temperature of 2 – 3°C and a reduction in average rainfall of 20 – 30%, and warmer and wetter winters with an increase in average winter temperature of 1 – 2°C and an increase in average rainfall of 10 – 20%. The intensity and frequency of extreme weather is expected to continue to increase. Data from the Met Office for Kent⁴ confirms that warming is already underway, with both maximum and minimum temperatures steadily rising over the decades since the 1980s, when compared to the preceding 50 years.

² UK Climate Projections programme (UKCP2018) DEFRA and the Met Office (2018) and ongoing annual UKCP findings summaries

³ Climate Change Risk and Impact Assessment for Kent and Medway, Kent County Council (2020)

⁴ www.metoffice.gov.uk/pub/data/weather/uk/climate/stationdata/manstondata

1.11 The Kent and Medway Energy and Low Emissions Strategy⁵ (ELES) sets out the approach to ‘clean, resilient economic recovery across Kent and Medway’. Annual Progress Reports monitor activity against a range of priorities, including promoting ‘the development of an affordable, clean and secure energy supply’. This Strategy identifies key opportunities to reduce greenhouse gas emissions, while promoting economic growth within local and national policy contexts. Ongoing initiatives include installing solar panels on suitable public sector buildings and land, such as offices, schools, and landfill sites; helping households to install renewable heat and electricity technologies; supporting community renewable energy projects and updating the Kent Design Guide to reflect net-zero targets and climate change adaptation.

1.12 Additionally, the ELES supports the Kent and Medway Local Nature Recovery Strategy (2025).

The Kent and Medway Local Nature Recovery Strategy

1.13 The Environment Act 2021 introduced a new statutory requirement in England to produce Local Nature Recovery Strategies (LNRS). The Kent and Medway LNRS is the first of its kind for the county and has been prepared by Kent County Council and its partners. It establishes priorities for local nature recovery; maps the most valuable existing areas for nature and opportunities for creating or improving habitats and supports nature-based solutions to climate change in Kent and Medway.

1.14 One of the 10 ambitions of the Kent and Medway LNRS is to maximise resilience to the challenges of climate change through actions to safeguard, manage and restore the county’s ecosystems. Nature-based solutions identified for Kent include carbon sequestration, soil and water quality improvements, water resources and flood and coastal erosion management and the LNRS establishes nature-based solution priorities and potential measures to deliver on this ambition. The LNRS is therefore an important reference when preparing renewable and low carbon energy development proposals in the Kent Downs National Landscape and this Position Statement has been prepared in accordance with it.

2. Legislative, policy and guidance context

2.1 National Landscapes are designated by the Government to ensure that the special qualities of the finest landscapes in England and Wales are conserved and enhanced. Section 82 of The Countryside and Rights of Way Act (CROW) 2000 is clear that the purpose of AONB designation is to conserve and enhance the natural beauty of the Area.

2.2 Section 85 of the CROW Act was amended in 2023 to create a new legal requirement on all relevant authorities. (Relevant authorities in this instance include local authorities, the Planning Inspectorate and other governmental agencies, Town and Parish Councils that are

⁵ Kent and Medway Energy and Low Emissions Strategy, Kent County Council (2021)

undertaking Neighbourhood Plans, and public and utility bodies). This new duty requires that

‘In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty in England, a relevant authority other than a devolved Welsh authority must seek to further the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty’⁶.

This new duty, which also applies to the setting of National Landscapes, represents a more proactive and strengthened duty than the previous duty on relevant authorities ‘to have regard to’ the purpose of AONBs when coming to decisions or carrying out their activities relating to or affecting land within these areas.

- 2.3 Guidance establishing how the Protected Landscapes Duty should operate and providing broad principles to guide relevant authorities in complying with it, was published by DEFRA in December 2024⁷. Additional guidance can also be found in the Advice Notes produced by the Kent Downs National Landscape Team for Local Planning Authorities and for Relevant Authorities in January 2026, which can be found on the Kent Downs National Landscape website.⁸

The National Planning Policy Framework (NPPF)⁹

- 2.4 In national planning policy, National Landscapes have the highest status of protection in relation to landscape and scenic beauty. As a result, the National Planning Policy Framework (NPPF) imposes a special category, that of ‘great weight’, which should always be applied to the conserving and enhancing of the landscape and scenic beauty of National Landscapes when determining all applications for development in National Landscapes¹⁰. The NPPF is clear that the scale and extent of development in National Landscapes should be limited, and that development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.
- 2.5 The NPPF is equally clear¹¹ that permission should be refused for major development in National Landscapes other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Case law has clarified that exceptional *need* does not necessarily equate to exceptional *circumstances*¹² i.e. arguing that the urgent national need to reduce carbon emissions and mitigate the harmful impacts of climate change does not mean that there may not be other more suitable circumstances

⁶ Levelling Up and Regeneration Act (2023) Section 245. Protected Landscapes; paras (5) - (10).

⁷ <https://www.gov.uk/government/publications/the-protected-landscapes-duty/guidance-for-relevant-authorities-on-seeking-to-further-the-purposes-of-protected-landscapes>

⁸ [New Duty to Seek to Further - Kent Downs](#)

⁹ A public consultation on a series of proposed changes to the NPPF took place in December 2025. When a new NPPF is published, this Position Statement will be reviewed and any changes that affect its contents will be made and brought to the attention of JAC members.

¹⁰ NPPF (2024) paragraph 189

¹¹ NPPF (2024) paragraph 190

¹² *Megavissey Parish Council v Cornwall Council* [2013] EHC 3684

in terms of delivery methods or locations, to those of a proposed development. In relation to the protected landscapes public interest test required by NPPF paragraph 190, in the case of proposals for renewable energy infrastructure development, this test applies particularly to the *location* of the proposed development, given that the public interest of the principle of renewable energy is, in and of itself, in keeping with the national interest.

- 2.6 At the same time, the NPPF requires that the planning system should support the transition to net zero by 2050 and should support renewable and low carbon energy and associated infrastructure provision¹³. In this regard, it is clear that development plans should maximise the potential for the allocation of sites for renewable energy developments, while ensuring that such sites are suitable and that adverse impacts are addressed appropriately, including cumulative landscape and visual impacts¹⁴. The NPPF makes clear that the determination of planning applications for all forms of renewable and low carbon energy developments and their associated infrastructure should not require applicants to demonstrate the overall need for renewable or low carbon energy and should give significant weight to the benefits associated with renewable and low carbon energy generation and the proposal's contribution to a net zero future. Decisions on renewable and low carbon energy proposals should also recognise that small-scale and community-led projects provide a valuable contribution to cutting greenhouse gas emissions, and, in the case of applications for the repowering and life-extension of existing renewable sites, should give significant weight to the benefits of utilising an established site.¹⁵

National Planning Practice Guidance

- 2.7 The government's position on the relationship between the two national objectives of protecting the highest quality landscapes of the country and the need to reduce net carbon emissions to zero by 2050, is reflected and clarified in the National Planning Practice Guidance (NPPG):

*'The National Planning Policy Framework explains that all communities have a responsibility to help increase the use and supply of green energy, but this does not mean that the need for renewable energy automatically overrides environmental protections and the planning concerns of local communities'*¹⁶.

- 2.8 How this balance should be applied within the context of National Landscapes is set out in more detail in subsequent paragraphs of the NPPG¹⁷. These confirm that the need for renewable or low carbon energy does not automatically override environmental protections and that all proposals in National Landscapes, and in areas close to them where there could be an adverse impact on the protected area, will need careful consideration, in addition to an assessment of policy and statutory requirements.

¹³ NPPF (2024) paragraph 161.

¹⁴ NPPF (2024) paragraph 165 a)

¹⁵ NPPF (2024) paragraph 168

¹⁶ NPPG Paragraph: 003 Reference ID: 5-003-20140306

¹⁷ NPPG Paragraph:007 Reference ID: 5-007-20140306

2.9 The NPPG¹⁸ also establishes clear guidance on how to approach development within the setting of a National Landscape. It advises that land within the setting of these areas often makes an important contribution to maintaining their natural beauty, and that poorly located or designed development can do significant harm. This is especially the case where long views from or to the designated landscape are identified as important, or where the landscape character of land within and adjoining the designated area is complementary, as is the case in the Kent Downs.

Clean Power 2030 Action Plan and National Policy Statements for Energy

2.10 The national Clean Power 2030 Action Plan¹⁹ sets out the government's detailed plan for delivering its target of clean power by 2030. This Action Plan is clear that new energy infrastructure 'should be built in a way that protects the natural environment'.

2.11 National Policy Statements for Energy set out the government's policy for delivery of major energy infrastructure. National Policy Statement for Energy (NPS EN-1)²⁰ states that in nationally designated landscapes such infrastructure must meet the test of demonstrating exceptional circumstances in the first instance and confirms that National Landscapes have the highest status of protection in relation to landscape and natural beauty and that the duty to seek to further the purposes of conserving and enhancing natural beauty applies to the determination of nationally significant energy infrastructure proposals in National Landscapes.

'National Parks, the Broads and AONBs have been confirmed by the government as having the highest status of protection in relation to landscape and natural beauty. Each of these designated areas has specific statutory purposes. Projects should be designed sensitively given the various siting, operational, and other relevant constraints. For development proposals located within designated landscapes the Secretary of State should be satisfied that measures which seek to further purposes of the designation are sufficient, appropriate and proportionate to the type and scale of the development'²¹.

2.12 With regard to the setting of National Landscapes, NPS EN-1 confirms that the duty to seek to further the purposes of nationally designated landscapes also applies when considering applications for projects outside the boundaries of these areas which may have impacts within them. In these locations, projects should be designed sensitively given the various siting, operational, and other relevant constraints and the Secretary of State should be satisfied that measures which seek to further the purposes of the designation are sufficient, appropriate and proportionate to the type and scale of the development.

2.13 The National Policy Statement for Renewable Energy Infrastructure (NPS EN-3) also acknowledges that a careful balance must be struck when considering applications for

¹⁸ NPPG Paragraph: 042 Reference ID: 8-042-20190721

¹⁹ assets.publishing.service.gov.uk/media/677bc80399c93b7286a396d6/clean-power-2030-action-plan-main-report.pdf

²⁰ National Policy Statement for Renewable Energy Infrastructure (EN-1) Jan 24.

²¹ Overarching National Policy Statement for Energy EN-1, paragraph 5,10.7 consultation draft May 2025

Critical National Priority Infrastructure (defined as nationally significant low carbon infrastructure) on sites within nationally recognised designations.

‘When considering applications for CNP Infrastructure in sites with nationally recognised designations (such as SSSIs, National Nature Reserves, National Parks, the Broads, Areas of Outstanding Natural Beauty, Registered Parks and Gardens, and World Heritage Sites), the Secretary of State will take as the starting point that the relevant tests in Sections 5.4 and 5.10 of EN-1 have been met, and any significant adverse effects on the qualities for which the area has been designated are clearly outweighed by the urgent need for this type of infrastructure.’²²

- 2.14 Sections 5.4 and 5.10 of the NPS EN-1 refer to meeting Habitats Directive and biodiversity objectives as applicable.

3. Renewable energy developments in the Kent Downs National Landscape

- 3.1 The Kent Downs National Landscape team acknowledges the national policy to increase the supply of renewable sources of energy in the interests both of the climate and of energy security and supports a nationally strategic approach to the location and deployment of renewable energy infrastructure, particularly at scale. However, in the case of proposed large-scale renewable energy installations in National Landscapes, the primary legislation and national strategic interest require the conserving and enhancing of natural beauty. Therefore, in the case of major development, when applying the tests of paragraph 190 of the NPPF, while the provision of renewable energy infrastructure is, in principle, in the public interest, as Section 2 of this Position Statement sets out such tests should be applied in the first instance to the *location* of the proposed development, rather than to the *principle* of increasing the provision of sources of renewable energy, and only when compliance with the exceptional circumstances test can be demonstrated. In this regard, renewable energy development proposed solely as a result of convenience (e.g. willingness of a landowner, or available grid connections) will not inevitably meet the exceptional circumstances or urgent need test.

The Kent Downs National Landscape

- 3.2 The Kent Downs National Landscape is a landscape whose distinctive character and natural beauty is so outstanding that it is protected for the nation in law. Centred on the distinctive chalk ridge that runs for over 50 miles from the iconic white cliffs to the edges of Greater London, the Kent Downs is a dramatic and diverse undulating landscape, shaped by its underlying geology. Key landscape characteristics include south-facing steep scarp slopes of chalk and of greensand, hidden dry valleys often capped by woodland, broad steep-sided river valleys, expansive open plateaux, highly valued woodlands and the cliffs and foreshore of the Heritage Coasts at Dover and Folkestone.

²² National Policy Statement for Renewable Energy Infrastructure (EN-3) (2023) paragraph 2.3.6

3.3 Today, the Kent Downs National Landscape is home to approximately 100,000 people, with more than a million people living within a kilometre of the boundary of this National Landscape. Given the increasing awareness of the importance of contact with nature for human health, the landscape of the Kent Downs plays a crucial role in the quality of life and wellbeing of a significant population of those living and working in the south-east region.

The Kent Downs AONB Management Plan

3.4 The Kent Downs AONB Management Plan Third Revision 2021 - 26 has been formally adopted by all the local authorities of the Kent Downs. The Management Plan supports renewable and sustainable energy initiatives that help to conserve and enhance the natural beauty of the National Landscape and bring environmental, social and economic benefits to local people. It recognises the importance of nature-based responses to climate change, including carbon sequestration, wilding, tree and hedgerow establishment, permanent grassland creation and management and soil carbon enhancement through regenerative farming.

3.5 The Principles from the adopted Management Plan that are considered to be of particular relevance when preparing and assessing proposals for renewable energy developments are set out in Appendix A. In particular Principle SD5 should be applied when assessing such proposals.

SD5 Renewable and sustainable energy initiatives and energy efficiency measures will be pursued where they help to conserve and enhance the natural beauty and landscape character of the Kent Downs AONB and bring environmental, social and economic benefits to local people and ensure proposals conform with the Kent Downs AONB Renewable Energy Position Statement, and resisted where they do not.

3.6 The Management Plan is currently being reviewed in line with statutory requirements. References to Management Plan actions and principles will therefore be updated in line with the review.

Sources of renewable energy generation

This Position Statement addresses the main forms of renewable energy generation; solar energy, wind energy, and biomass (wood fuel and anaerobic digestion).

Further advice on design principles can be found in the Kent Downs National Landscape- led Design Handbook. Specific advice on appropriate colour choice to assist in new development integrating into the setting of the Kent Downs landscape can be found in the Kent Downs National Landscape Guidance on the Selection and Use of Colour.

Solar energy

Commercial-scale solar arrays and installations

3.7 Commercial-scale solar arrays or photovoltaic installations, comprising multiple ground-mounted panels laid out across open fields, together with associated infrastructure including access tracks, boundary fencing and ancillary structures such as battery storage

and substations, are usually considered to constitute major development. For major developments, national policy is clear that:

- 3.8 *Such proposals should be refused unless, in accordance with paragraph 190 of the NPPF, there are both exceptional circumstances and the development is in the public interest.
- 3.9 *Applications must therefore, in the first instance, demonstrate how such tests can be met as part of any proposals.
- 3.10 Solar installations usually require south facing and open sites, to maximise the availability of largely uninterrupted direct sunlight. The Kent Downs is a landscape of particularly high sensitivity in this regard. It is one which is characterised by small or medium sized fields bordered by mature hedgerows, shelter belts and shaws and by open dry valleys, all within a distinctive topography which affords wide ranging views, predominantly to the south, from the higher topography of its extensive chalk escarpment and greensand ridge, all of which contribute to the special qualities for which it was designated.
- 3.11 The landscape and visual impact of commercial or large-scale²³ arrays of ground-mounted solar panels and associated solar inverters, battery storage and other infrastructure, on natural beauty, is always significant. The impact of these particular forms of solar developments on rural landscapes is specifically addressed in the NPPG which acknowledges that ‘the deployment of large-scale solar farms can have a negative impact on the rural environment, particularly in undulating landscapes’²⁴. It advises when assessing planning applications for solar energy proposals that factors to bear in mind include ‘the effect on a protected area such as an Area of Outstanding Natural Beauty’²⁵.
- 3.12 In the case of commercial-scale solar arrays, NPPF Paragraph 190 sets out that applications for major development should include an assessment of the need for the development, scope to develop outside the designated area or meet the need in some other way and the extent to which any detrimental effect on the environment, the landscape and recreational opportunities can be moderated. The locational requirements for open south-facing land, in addition to the scale and form of the solar panel arrays themselves, mean that such installations will inevitably have a discordant effect on the special characteristics of the Kent Downs National Landscape. To introduce a multitude of structures of an industrial appearance on extensive areas of agricultural land, compounded by the imposition of a rigid grid layout in an otherwise organic landscape, will detract from the protected topography to a degree that is incompatible with the special qualities and landscape characteristics for which the Kent Downs National Landscape was designated.
- 3.13 It is unlikely that any location could be found in the National Landscape where major commercial-scale photovoltaic installations would not have a significant adverse effect on the landscape and the sense of remoteness, natural beauty and landscape character for

²³ Sometimes defined as any developments that occupy more than 5 hectares; the quantum of land area commonly required for financial viability.

²⁴ Para 013 Reference ID: 5-013-20150327).

²⁵ NPPG (at Paragraph: 012 Reference ID: 5-012-20140306)

which the Kent Downs is nationally valued and protected. Such installations would directly conflict with the purpose of the designation and statutory management plan objectives for this protected landscape. The Kent Downs National Landscape team will therefore usually strongly resist proposals in the National Landscape for commercial-scale photovoltaic installations.

Single or small groups of ground-mounted solar panels

- 3.14 Proposals for single or small groups of ground-mounted solar panels that serve individual or small groups of properties, community facilities, or rural businesses, have more potential to be accommodated within the National Landscape, provided that careful attention is paid to their visual impact and to the need to screen or absorb the panel/s within their built or landscape context as far as is possible. This is particularly the case where such installations are installed close to or on existing buildings, thereby reducing their visual impact in the wider landscape context.
- 3.15 Sensitive site selection, design and planning are crucial to ensure that the visual impact of such smaller scale solar installations can be satisfactorily addressed within the landscape. Particular attention should be paid to the location, siting and design of the panels, taking account of the topography and any existing sense of enclosure that a site can offer. Where new screening is proposed, care needs to be taken to ensure that the screening does not itself adversely affect wider views and accords with the landscape character area in which the site is located. Solar panels installed in locations which are isolated from other structures are more likely to be harmful to the special qualities of this National Landscape.
- 3.16 In the case of small groups of ground-mounted solar panels, proposals will be expected to demonstrate, through a Landscape and Ecological Management Plan, how the land under and between panels across the application site will be managed and planted. Monitoring programmes are encouraged to ensure that land management is kept under regular review.
- 3.17 Solar installations have a temporary lifespan, and in protected landscapes it is particularly important that such aspects of proposed developments are honoured and the site returned to its former use when panels are decommissioned. When renewable energy proposals are approved, we would therefore wish to see their removal conditioned, monitored and enforceable arrangements made for a commuted sum to be retained (for instance from the income generated) to ensure such work is delivered. In this regard, all ground-mounted solar proposals are expected to use screw piles rather than the installation of concrete pads in order to ensure associated infrastructure is kept to a minimum appropriate to their location in this highly sensitive landscape and for ease of restoring the land to agricultural use. The fixing method used should be informed by an assessment of the significance of the archaeological resource to ensure appropriate conservation.
- 3.18 Finally, it is important that non-reflective coating and dark, recessive non-reflective frames are used in all solar panels installed in order to reduce glint and glare when viewed from both close and long-range views within, from and towards the National Landscape, including from the North Downs Way National Trail and the wider Public Rights of Way network. Such non-reflective coating also plays an important role in reducing the potential for harm to the

wildlife species that live and feed in this protected landscape and which can get disorientated by the appearance and materials of solar panels.

Rooftop solar panels

- 3.19 The positive features of rooftop solar installations have long been recognised. Roofs provide readily available space to generate solar-powered electricity, very close to the source of demand and require far less land than ground mounted panels. Solar panels can be placed on roof surfaces or integrated into the roofs themselves, using solar shingles, solar tiles and slates, or solar glass laminates, for example. Industry innovation in this field is advancing rapidly given the considerable potential for this form of renewable energy generation.
- 3.20 Extensive research undertaken by University College London Energy Institute²⁶ concluded that installing solar panels on new buildings, existing large warehouse rooftops and other land such as car parks, could contribute more than half of the total national target of 70GW of solar energy by 2035 alone, and would require considerably less land than ground-mounted alternatives. Agricultural and commercial buildings, which usually offer larger roofscapes than residential properties, are considered to offer particular opportunities for renewable energy generation in the rural landscape of the Kent Downs.
- 3.21 Notwithstanding that the visual impact of such sources of solar energy is less significant than ground-mounted solar panels, care is needed with the impact of solar panel installations on the appearance of the building itself and its wider landscape context. Particular care will need to be taken in the case of proposals affecting the significance of designated heritage assets where the NPPF requires that great weight should be given to the asset's conservation. In the case of non-designated heritage assets, the effect of such building-mounted proposals on the asset's significance should be taken into account.
- 3.22 Applications for solar canopies in car parks will be assessed on a case-by-case basis, taking account the location of the car park in relation to nearby buildings and its setting within the context of the wider landscape. Emerging technologies, such as transparent solar panels that can be integrated into windows, skylights and glass facades without altering the appearance of buildings, provide encouraging approaches for harnessing solar energy from buildings in protected landscape locations.
- 3.23 The NPPF advises that significant weight should be given to the need to support energy efficiency and low carbon heating improvements to existing buildings through solar panel installation on the buildings themselves²⁷. This approach is supported by the Kent Downs National Landscape team as an effective way of increasing the provision of renewable energy in this protected landscape and should be considered in the first instance. Exceptions to this approach are in respect of designated heritage assets, including listed historic buildings, scheduled monuments and the Conservation Areas that lie at the heart of many of the historic settlements of the Kent Downs, which are an important component of

²⁶ [Rooftop-Revolution-Report.pdf \(cpre.org.uk\)](#) (2023)

²⁷ NPPF 2024 paragraph 164

its natural beauty. In such instances, small scale, sensitively located and well screened ground mounted installations that serve individual or small groups of buildings may be more likely to be appropriate.

3.24 Rooftop solar energy provision is considered to offer the potential to be more compatible with the duty to further the purpose of conserving and enhancing the natural beauty of the National Landscape than ground mounted schemes. The use of rooftop solar, including by retrofitting, is therefore an approach the Kent Downs National Landscape Team encourages and, noting the exceptions set out in paragraph 3.21 above, would wish to see considered in the first instance where such an approach is feasible.

SOLAR ENERGY IN THE KENT DOWNS: KDNL POSITION SUMMARY

Solar energy proposals are more likely to be acceptable where:

- Panels are small in scale, serving individual or small groups of properties, community facilities, agricultural properties or rural businesses, and do not result in a harmful visual impact on the landscape in which they are located;
- With the exception of heritage assets, panels are mounted on roofs or walls of buildings. In the case of a single or a small group of ground-mounted panels, evidence is provided that demonstrates roof or wall-mounted provision has been considered in the first instance and why this is not feasible;
- Panels are sensitively located on or adjoining existing buildings and are well screened;
- Non-reflective coating and recessive colours to panels and panel frames are used;

Additionally, in the case of ground mounted panels:

- A Landscape and Ecological Management Plan, including an under-panel habitat management plan, is provided, setting out how landscape enhancements will be achieved and managed over the lifetime of the development and including plans for monitoring; and
- Screw piles are used and associated cabling and other infrastructure is kept to a minimum. In the case of areas of archaeological potential, the fixing method used should be informed by an assessment of the significance of the archaeological resource in order to ensure appropriate conservation.
- A timetable for the legally enforceable removal of the panels and the reinstatement of the land to its previous use within 3 months of decommissioning is conditioned by the planning consent, enforced and funded through a commuted sum (for instance from the income generated).

Wind energy

3.25 The Kent Downs is a landscape that is particularly sensitive to wind turbine developments given the nature and scale of turbines, their requirement for exposed locations, and the lack of effective mitigation options to limit the harm and intrusion to the character, appearance and defining topography of this protected landscape. The extensive and distinctive chalk

escarpment is a nationally significant skyline, and together with the greensand ridge is a significant component of this National Landscape. Extensive views across the setting of the Kent Downs from and to the escarpment are at the core of this National Landscape and are cited as among the special qualities for which it is designated. Furthermore, tranquillity is a valued and important component of the natural beauty of the Kent Downs National Landscape. Tranquillity is threatened by the movement, noise and light flicker generated by wind turbines, and as a result such elements of wind power development are incompatible with conserving and enhancing of natural beauty. Again, opportunities to mitigate such harm are limited.

3.26 Owing to the special characteristics and landscape qualities for which the Kent Downs was designated, and the high sensitivity of the landscape itself, large-scale commercial wind turbine developments are unlikely to comply with the statutory duty to further the purpose of conserving and enhancing natural beauty, and to meet the policy requirements for major development set out in NPPF.

3.27 Single, small-scale turbines which serve individual properties can, however, potentially be appropriate, provided that such turbines are not installed in isolated locations but instead are clearly associated with settlements or existing groups of buildings or structures and are set against a backdrop of woodland or buildings, are positioned below the skyline and are of an appropriate colour. A small-scale turbine is usually considered to be one that is under 15m to the hub height and a maximum of 25m to the blade tip. Turbines should respect the characteristics of the landscape character area where they are positioned, and, where positioned near to existing buildings, should not dominate them to a visually harmful degree. As with building or roof-mounted solar panels, particular care should be taken in the case of turbines proposed in proximity to designated heritage assets, where the potential impact of such installations on the significance of the heritage asset, including any contribution made by their setting, must be considered. As with all renewable energy developments, account should be taken of any cumulative impact of individual turbines to avoid harm to the natural beauty of the Kent Downs.

WIND ENERGY IN THE KENT DOWNS: KDNL POSITION SUMMARY

Wind energy proposals are more likely to be acceptable where turbines are:

- Proposed as a single turbine installation or as a small group related to and serving individual properties only;
- Small in scale and with very low landscape impact (under 15m to the hub height and a maximum of 25m to the blade tip);
- Set against a backdrop of woodland or buildings and not in an isolated location;
- Positioned below the skyline;
- Of an appropriate colour in line with Kent Downs National Landscape Guidance on Colour Selection

- All wind turbine proposals should include a legally enforceable timetable for the removal of the turbine/s and the reinstatement of the land to its previous use within 3 months of decommissioning made affordable through a commuted sum provided from the income generated.

Biomass

3.28 Biomass used for generating energy usually comes from forest products (wood fuel), agricultural crops and residues, or biodegradable waste such as animal manure. The National Policy Statement on Renewable Energy Infrastructure (EN-3) advises that biomass plays an important role in meeting the UK's energy needs, and that furthermore, the recovery of energy from the combustion of waste forms an important element of waste management strategies. However, it acknowledges that the process has the potential to result in harmful impacts, including in terms of noise, vibration, odour, vermin infestations and air quality as well as on the character and qualities of the landscape in which such forms of energy generation are proposed. In this National Landscape proposals should demonstrate that such potential adverse impacts have been satisfactorily addressed and that the infrastructure required will not have a significant adverse effect on the special qualities for which this landscape was designated.

Wood fuel

- 3.29 Woodland accounts for 23% of the Kent Downs, representing the second largest land use. The coppiced woodland of the Kent Downs has long been an important target for wood fuel based renewable energy generation and is a form of renewable energy that can support sustainable woodland management. Such active management of the woodlands of the Kent Downs through coppicing, pollarding and other forestry operations can, when carefully conducted according to an approved woodland management plan, help to enhance habitats and deliver gains in biodiversity.
- 3.30 It is acknowledged that wood fuel biomass boilers are a potential source of air pollution, particularly with regards to particulates. However, improvements in the efficiency of stoves and boilers are proving to reduce the risk of harmful emissions. Small-scale wood fuel schemes that use locally sourced wood from sustainably managed woodlands within the Kent Downs can be appropriate sources of renewable energy here.
- 3.31 The management of woodland for the generation of renewable energy should be carried out through an approved woodland management plan. Priority should always be given to using existing buildings, such as farm buildings, to house facilities to dry or process wood. New buildings may be appropriate where it has been established that no existing buildings are available or capable of conversion to this use. The siting, scale, design, colour and materials used for any new buildings should always be carefully considered to ensure that any impact on the natural beauty and characteristics of the Landscape Character Area in which the proposed development is located is appropriately mitigated. Clean burn technology should be used to meet best current standards.

Anaerobic digestion

- 3.32 The anaerobic digestion process involves breaking down organic waste, such as food waste or manure, straw and other crop arisings, generated by farming operations, to create low carbon energy. As an alternative to the landfill disposal of such farm waste, anaerobic digestion also contributes to a reduction in the methane emissions that are associated with landfill disposal.
- 3.33 Anaerobic digestion is an industrial process. Combined Heat and Power units are required on site to provide both heat for the anaerobic digestion process and electricity for the operations. Such structures are industrial in appearance and when proposed on a medium or large scale or when located on farmland away from existing buildings or settlements, can result in significant harmful changes in landscape character. In responding to such applications, the effects and potential harm that may arise from visual intrusion, as well as noise, increased activity, lighting, odour, traffic movements and other infrastructure such as overhead powerlines associated with such developments will therefore be considered, as they would for any other industrial development proposals. Commercial land, including commercial land allocations, is the appropriate location for large or medium scale industrial developments of this nature in the Kent Downs National Landscape.
- 3.34 Anaerobic digestion plants serving a single or small number of farms located in close proximity to each other, and using material only sourced from such farms, can be appropriate within this National Landscape, provided that the development is small in scale and can be incorporated within an existing farmstead to ensure that it is not visually intrusive or harmful to the characteristics of the Landscape Character Area in which it is proposed.
- 3.35 Farm waste used to generate energy should be that arising from existing farming practices. The growing of crops specifically for use as fuel for anaerobic digestion plants is at odds with the principle of sourcing energy from waste material.

BIOMASS PROPOSALS IN THE KENT DOWNS: KDNL POSITION SUMMARY

Biomass proposals are more likely to be acceptable where they are:

- Small in scale;
- Housed in existing buildings;
- Located within existing farmsteads and not in isolated locations;
- In the case of wood fuel, use only sustainably produced wood from the Kent Downs National Landscape;
- In the case of anaerobic digestors, use farm waste sourced from the land holding where the plant itself is located or where it sources the waste from both the farm where it is located and from a small number of adjacent farms.

[A note on battery storage](#)

- 3.36 Renewable energy, particularly that generated from solar and wind sources, is weather dependent and therefore not capable of being harnessed at all times. To address this issue, some renewable energy schemes include battery storage infrastructure within the development to maximise their contribution to the national energy supply.
- 3.37 Battery facilities that can store large amounts of energy, but which are not co-located or directly connected to a renewable energy generating development are becoming more common. While electricity storage is essential for a resilient energy system, helping to maintain the stability of the grid, battery storage in and of itself does not constitute renewable energy development as it does not generate energy, nor can the source of the energy that it stores be limited to renewable sources. Such standalone forms of development are industrial in character and appearance and therefore most appropriately located alongside other industrial uses.
- 3.38 The status of developments that only store energy as opposed to those that generate renewable forms of energy is clarified in the NPS EN-3 'Renewable Energy Infrastructure', which does not include battery storage in and of itself as a form of renewable energy. Instead, this National Position Statement is clear that battery storage that can be considered as part of the supply of renewable energy is limited to storage that co-locates with either wind, solar generating schemes or carbon capture and usage (i.e. biomass) or pumped hydro storage.

4. Renewable energy developments in the setting of the Kent Downs National Landscape

- 4.1 The setting of the Kent Downs National Landscape does not have a defined border. In most cases, the setting encompasses land which lies outside the National Landscape boundary, but which is visible from it, and from which the National Landscape can be seen. As the Setting Position Statement produced by the Kent Downs National Landscape Team explains, the setting may be wider however, for example in the case of noise and light and where there is a contrast in topography between higher and lower ground. The upland natures of both the chalk scarp and the greensand ridge are prominent and highly distinctive features in the wider landscape. Views towards these important components of this National Landscape, as well as the long-distance panoramas offered across open countryside from the chalk scarp and the greensand ridge, primarily in a southerly direction, have been deemed in appeal decisions to be as relevant to the consideration of setting.
- 4.2 The NPPG is clear²⁸ that land within the setting of National Landscapes makes an important contribution to maintaining their natural beauty, and therefore poorly located or designed development can do significant harm. This is especially the case where long views from or to the designated landscape are identified as important, or where the landscape character of land within and adjoining the designated area is complementary.

²⁸ NPPG paragraph Reference ID: 8-042-20190721

4.3 The NPPF requires²⁹ that development within the setting of National Landscapes should be sensitively located and designed to avoid or minimise adverse impacts on the designated area. Renewable energy proposals are more likely to meet such requirements where they:

- Have been carefully designed through attention to the scale, orientation, layout, height, materials;
- Are located to avoid sites that are prominent in views from the National Landscape;
- Use non-reflective surfaces and appropriate colour for installations and associated infrastructure;
- Ensure that any new structures are located close to existing buildings; and
- Are accompanied by appropriate screening and landscaping provision.

4.5 The Kent Downs National Landscape Setting Position Statement provides further guidance on issues of setting.

5. Conclusions

5.1 While government policy affirms that the generation of renewable energy in this country needs to increase, national planning policy, as set out in the NPS, the NPPG and the NPPF, is clear that it does not automatically follow that all schemes for renewable energy generation will be acceptable given that in the UK government policy is also to protect in law the most outstanding landscapes for their natural beauty. In compliance with national planning policy, assessing the suitability of a renewable energy development proposal in the Kent Downs National Landscape, or its setting, must therefore focus on the ability of a scheme to meet the statutory purpose of conserving and enhancing the natural beauty, including the special qualities and landscape character of this National Landscape in the first instance. It is inevitable, as appeal decisions demonstrate, that not all forms of renewable energy development, particularly larger and more visually intrusive developments, will comply with this statutory purpose.

5.2 This Position Statement has been prepared to assist all those considering or involved in proposals to generate renewable energy within the National Landscape and its setting, including residents, businesses and landowners. It provides guidance and clarity on the approach to matters, including form, design and location, that is considered appropriate in this protected landscape. It advises that renewable energy developments in the Kent Downs National Landscape which are modest in scale and are located on or within existing farmsteads or building clusters are less likely to have an adverse impact on the natural beauty of the Kent Downs and therefore are more likely to be acceptable in landscape terms. In the case of solar and wind energy generation, the landscape and visual impact of commercial-scale arrays and installations is always significant and usually in conflict with the statutory purpose of National Landscapes and are therefore likely to be resisted in the consultation responses of the Kent Downs National Landscape team to significant proposals of this kind.

²⁹ NPPF paragraph 182

- 5.3 Renewable energy development proposals in or affecting the National Landscape should be based on a full account being taken of the likely impacts of such developments on the landscape character and special qualities of the National Landscape and its setting, including through the production of thorough Landscape and Visual Impact Assessments, and Environmental Impact Assessments where appropriate.
- 5.4 Further advice on design principles can be found in the Kent Downs Landscape Design Handbook. Specific advice on appropriate colour choice to assist in new development integrating into the setting of the Kent Downs landscape can be found in the Kent Downs National Landscape Guidance on the Selection and Use of Colour.
- 5.5 The Kent Downs National Landscape team will monitor and comment as appropriate on significant renewable energy applications in the Kent Downs and its setting, in accordance with the agreed Planning Protocol.

APPENDIX A

Kent Downs Management Plan 2021 - 2026

The following principles of the Kent Downs AONB Management Plan 2021-26 are considered particularly relevant to proposals for renewable energy developments:

MMP2 The Kent Downs AONB is a material consideration in plan making and decision taking, and so local authorities will give a high priority to the AONB Management Plan vision, aims, principles and actions in Local Plans, development management decisions, planning enforcement cases and in taking forward their other relevant functions.

SD1 Ensure that policies, plans, projects and net gain investments affecting the Kent Downs AONB take a landscape led approach, are long term, framed by the Sustainable Development Goals appropriate to the Kent Downs, cross cutting and recurrent themes, the vision, aims and principles of the AONB Management Plan.

SD2 The local character, qualities, distinctiveness and natural resources of the Kent Downs AONB will be conserved and enhanced in the design, scale, siting, landscaping and materials of new development, redevelopment and infrastructure and will be pursued through the application of appropriate design guidance and position statements.

SD3 Ensure that development and changes to land use and land management cumulatively conserve and enhance the character and qualities of the Kent Downs AONB rather than detracting from it.

SD4 A strategic, evidence led approach to both the adaptation to and mitigation of the impacts of climate change on the natural beauty and historic character of the Kent Downs, and its human consequences, will be pursued with an urgent focus on supporting greenhouse gas emission reduction and sequestration through nature-based solutions.

SD5 Renewable and sustainable energy initiatives and energy efficiency measures will be pursued where they help to conserve and enhance the natural beauty and landscape character of the Kent Downs AONB and bring environmental, social and economic benefits to local people and ensure proposals conform with the Kent Downs AONB Renewable Energy Position Statement, and resisted where they do not.

LLC1 The protection, conservation and enhancement of special characteristics and qualities, natural beauty and landscape character of the Kent Downs AONB will be supported and pursued.